

Presentment Date: May 3, 2024 at 4:00 p.m. (Prevailing Eastern Time)
Objection Deadline: May 2, 2024 at 4:00 p.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF PRESENTMENT OF
ELEVENTH STIPULATION AND AGREED
ORDER FURTHER EXTENDING TIME TO
TAKE ACTION, TO THE EXTENT NECESSARY,
TO DETERMINE THE NONDISCHARGEABILITY OF A DEBT
OWING TO A GOVERNMENTAL UNIT PURSUANT TO 11 U.S.C. §1141(d)(6)**

PLEASE TAKE NOTICE that, on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC (“Holdco”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

PLEASE TAKE FURTHER NOTICE that, the Debtors shall present the *Eleventh Stipulation and Agreed Order Further Extending Time to Take Action, to the Extent Necessary, to Determine the Nondischargeability of a Debt Owing to a Governmental Unit Pursuant to 11 U.S.C. §1141(d)(6)* attached hereto as **Exhibit 1** (the “Stipulation and Order”) to the Honorable Sean H. Lane, United States Bankruptcy Judge, for signature on **May 3, 2024 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that any responses or objections (each an “Objection”) to the Stipulation and Order must be made in writing and received in the chambers of the Honorable Sean H. Lane and by the undersigned not later than **May 2, 2024 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that in the event any Objections to the proposed Order are timely filed and served on or before the Objection Deadline as set forth herein, a hearing to consider the Stipulation and Order and such Objection(s) shall be scheduled by the Bankruptcy Court.

Dated: April 26, 2024
New York, New York

/s/ Luke A. Barefoot
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Exhibit 1

Stipulation and Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<hr/>)	Case No. 23-10063 (SHL)
<i>In re:</i>)	
)	Chapter 11
Genesis Global Holdco, LLC, <i>et al.</i>,)	
)	
Debtors.¹)	(Jointly Administered)
<hr/>)	

**ELEVENTH STIPULATION AND
AGREED ORDER FURTHER EXTENDING TIME
TO TAKE ACTION, TO THE EXTENT NECESSARY, TO
DETERMINE THE NONDISCHARGEABILITY OF A DEBT OWING
TO A GOVERNMENTAL UNIT PURSUANT TO 11 U.S.C. §1141(d)(6)**

WHEREAS, the Parties² entered into that certain *Stipulation and Agreed Order Extending Time to Take Action, to the Extent Necessary, to Determine the Nondischargeability of a Debt Owning to a Governmental Unit Pursuant to 11 U.S.C. §1141(d)(6)* [ECF No. 418] dated June 12, 2023 (the “First Stipulation”), extending the date by which the Governmental Parties must file their complaint or take action that may be required, if any, in these Chapter 11 Cases to determine the nondischargeability of a debt, pursuant to Section 1141(d)(6) or Section 523 of the Bankruptcy Code to July 31, 2023 (“Nondischargeability Deadline”), which was approved by the Court on July 12, 2023 [ECF No. 494];

¹ The Debtors in these Chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the First Stipulation.

WHEREAS, on July 25, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to August 31, 2023 [ECF No. 541], which was approved by the Court on August 10, 2023 [ECF No. 593] (the “Second Stipulation”);

WHEREAS, on August 29, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to September 29, 2023 [ECF No. 630], which was approved by the Court on October 2, 2023 [ECF No. 769] (the “Third Stipulation”);

WHEREAS, on September 29, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to October 31, 2023 [ECF No. 764], which was approved by the Court on October 23, 2023 [ECF No. 826] (the “Fourth Stipulation”);

WHEREAS, on October 31, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to November 30, 2023 [ECF No. 871], which was approved by the Court on December 18, 2023 [ECF No. 1054] (the “Fifth Stipulation”);

WHEREAS, on November 27, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to December 29, 2023 [ECF No. 983], which was approved by the Court on December 18, 2023 [ECF No. 1055] (the “Sixth Stipulation”);

WHEREAS, on December 27, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to January 31, 2024 [ECF No. 1089], which was approved by the Court on January 8, 2024 [ECF No. 1135] (the “Seventh Stipulation”);

WHEREAS, on January 30, 2024, the Parties stipulated to further extend the Nondischargeability Deadline to February 29, 2024 [ECF No. 1209], which was approved by the Court on February 9, 2024 [ECF No. 1278] (the “Eighth Stipulation”);

WHEREAS, on February 27, 2024, the Parties stipulated to further extend the Nondischargeability Deadline to March 29, 2024 [ECF No. 1399] (the “Ninth Stipulation”);

WHEREAS, on March 28, 2024, the Parties stipulated to further extend the Nondischargeability Deadline to April 30, 2024 [ECF No. 1531] (the “Tenth Stipulation”);

WHEREAS, the Governmental Parties now seek a further extension of the Nondischargeability Deadline, and without binding precedent in this jurisdiction on this issue, and in order to avoid unnecessary litigation, the undersigned parties nonetheless jointly seek a further extension of the Section 523(c)/Rule 4007(c) deadline out of an abundance of caution, without prejudice to the Governmental Parties’ right to seek further extensions (this “Eleventh Stipulation”);

Based on the foregoing stipulation of the parties, it is ORDERED that:

1. To the extent Section 523(c) or Rule 4007(c) applies, the date by which the Governmental Parties must file their complaint or take other action that may be required, if any, in these Chapter 11 cases to determine the nondischargeability of a debt, pursuant to Section 1141(d)(6) or Section 523 of the Bankruptcy Code, shall be May 31, 2024, or such later date as may be ordered by the Court, without prejudice to the Governmental Parties’ right to seek further extensions of the date.

2. This Eleventh Stipulation represents the entire agreement by and between the Parties with respect to the subject matter hereof, and all prior understandings or agreements, if any, are merged into this Eleventh Stipulation.

3. Other than as set forth in paragraphs 1 and 2 hereof, nothing in this Eleventh Stipulation shall, or is intended to, modify any terms, conditions or provisions of the First

Stipulation, the Second Stipulation, the Third Stipulation, the Fourth Stipulation, the Fifth Stipulation, the Sixth Stipulation, the Seventh Stipulation, the Eighth Stipulation, the Ninth Stipulation or the Tenth Stipulation and all such terms, conditions and provisions of the First Stipulation, the Second Stipulation, the Third Stipulation, the Fourth Stipulation, the Fifth Stipulation, the Sixth Stipulation, the Seventh Stipulation, the Eighth Stipulation, the Ninth Stipulation and the Tenth Stipulation shall continue to apply to this Eleventh Stipulation.

IT IS SO ORDERED.

Dated: _____
White Plains, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

IN WITNESS WHEREOF, the Parties, by their respective authorized counsel, have
executed this Eleventh Stipulation as of the date written below:

Dated: April 26, 2024
New York, New York

By: /s/ Luke A. Barefoot
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- and -

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